

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,	)	
	)	
vs.	)	No. 1:19-cr-00156-MAD
	)	
XIAOQING ZHENG.	)	

**MOTION FOR WITHDRAWAL OF  
MATTHEW W. OLINZOCK AS COUNSEL FOR DEFENDANT**

Matthew W. Olinzock respectfully moves this Court for an order permitting the withdrawal of his appearance as counsel for Defendant Xiaoqing Zheng (the “Defendant”) in this matter. In support thereof, the undersigned states as follows:

1. Prior to July 10, 2020, Defendant was represented in this matter by Kevin A. Luibrand from the Luibrand Law Firm PLLC and two attorneys from the law firm of Breeding Henry Baysan PC—Bradley L. Henry (the lead attorney), and Matthew W. Olinzock.
2. On July 10, 2020, Mr. Henry left Breeding Henry Baysan PC and began practicing with the law firm of Michelman & Robinson LLP. Mr. Henry’s new contact information is:

Michelman & Robinson LLP  
800 Third Avenue, New York, NY 10022  
212-730-7700  
[bhenry@mrlp.com](mailto:bhenry@mrlp.com)

3. Defendant has since informed the undersigned counsel that he desires to continue with his representation by Mr. Henry, have his filed transferred to Mr. Henry’s new firm, and for Mr. Olinzock to withdraw as counsel.
4. Defendant will continue to be represented in this matter by his other counsel of record—Mr. Luibrand and Mr. Henry.

**WHEREFORE,** Matthew W. Olinzock respectfully requests that the instant motion be granted; and that the Court grant Mr. Olinzock leave to withdraw as counsel.

Respectfully submitted,

/s/ Matthew W. Olinzock  
Matthew W. Olinzock  
900 South Gay Street, Suite 1950  
Knoxville, Tennessee 37902  
Tel: 865-670-8535  
Fax: 865-670-8536  
molinzock@bhblegal.com  
*Withdrawing Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I, Matthew W. Olinzock, an attorney, certify that on August 28, 2020, I served the above by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Matthew W. Olinzock  
Matthew W. Olinzock